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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA GEORGIA 30303-8960

January 24, 2011

Mr. Larry O. Gissentanna, BRAC Environmental Coordinator, 1508 Hood Ave, Building 714, Fort Gillem, GA 30297-5161

SUBJECT: EPA NEPA Comments on Final Environmental Impact Statement (FEIS) for the Disposal

and Reuse of Fort McPherson, Georgia, CEQ No. 20100479

Dear Mr. Gissentanna:

Consistent with the U.S. Environmental Protection Agency's (EPA) Clean Air Act (CAA) § 309 and National Environmental Policy Act (NEPA) § 102 (2)(C) responsibilities, EPA has reviewed the above identified FEIS.

Background

The 2005 Defense Base Realignment and Closure (BRAC) Commission recommended the closure of Fort McPherson, Georgia, and the relocation of its existing tenant organizations including the Headquarter offices for the US Army Forces Command (FORSCOM), US Army Reserve Command (USARC), Third US Army, Installation Management Command South East, the US Network Enterprise Technology Command Southeast Region, and the Army Contracting Agency Southern Region.

The purpose of this FEIS is to address the closure of Fort McPherson mandated by the 2005 BRAC Commission. The Army's real property interests involve a 487-acre property with 2.3 million square feet of building space and a 200-acre 18-hole golf course. The NEPA analysis evaluated the environmental and socioeconomic impacts of the disposal and reasonably foreseeable reuse of the federal property.

The alternatives evaluated in the FEIS included: early transfer disposal (prior to of environmental remediation), traditional disposal (after completion of remediation), caretaker status (secure property in perpetuity with continued remediation), and the no action alternative which is inconsistent with the BRAC Commission recommendation/decision. The preferred alternative is early transfer disposal.

The FEIS disposal alternatives included: transfer to another federal agency, public benefit conveyance, economic development conveyance, negotiated and competitive sale, exchanges for military construction, conservation conveyance, and conveyance for cost of environmental remediation. According to the FEIS, the Army will transfer its real property interest in six buildings, including the Lawrence Joel Army Health and Dental Clinic, to the Veterans Administration. The Army is working with two credit unions requesting conveyance of their currently leased property.

The EIS analyses also considered the Reuse Plan and alternatives based on the McPherson Planning Local Redevelopment Authority (MPLRA)'s September 2007 Draft Plan. The reuse alternatives included high-intensity, medium-high-intensity, and medium-intensity reuse. The MPLRA has expressed a preference for mixed-use sustainable development at the medium high intensity reuse, which is a higher level of intensity than Fort McPherson's prior operating conditions.

EPA Comments:

EPA acknowledges the proposed action is the MPLRA's preferred alternative and after September 15, 2011, it ceases being a federal action with the transfer of all of Fort McPherson's real property to civilian ownership consistent with Army authorities and regulations. After this date, the MPLRA will be replaced with the Georgia Governor's created McPherson Implementing Local Redevelopment Authority (MIRLA) which has the authority to receive, purchase, lease, or otherwise acquire land from the federal government. EPA's draft EIS (DEIS) comments requested the FEIS reflect environmental concerns identified during the DEIS review. The identified concerns covered potential impacts to air quality, environmental justice and noise, "green" and sustainable development, solid waste disposal, storm-water runoff, and water quality and conservation.

EPA appreciates and thanks the Army for its efforts made to incorporate EPA's identified concerns into the FEIS to raise awareness to the succeeding civilian MIRLA for reuse of the Fort in a manner consistent with public health and long-term viability of the proposed reuse. Thank you the opportunity to review and comment upon the proposed action. Please contact Beth Walls of my staff ((404) 562-8309 or walls.beth@epa.gov) for any comment question or discussion.

Sincerely,

Heinz J. Mueller, Chief NEPA Program Office

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Office of Policy and Management

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